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Hon. Barbara C. Moses
United States Magistrate Judge
U.S. District Court for the Southern District of New York
500 Pearl Street, Room 920
New York, NY 1007-1312

June 7, 2021

MEMO ENDORSED

Re: DuBois v. Commissioner of Social Security
Civil Action No: 1:20-cv-08422-BCM

Dear Judge Moses:

This letter respectfully requests an extension of time of sixty-one (61) days for Plaintiff to file her Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on June 9, 2021 (Dkt. 7). Due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. Counsel requests the additional time to prepare a proper, meritorious brief that meets the expectations of this Court and advocates properly for the client.

Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to file Plaintiff's Motion for Judgment on the Pleadings.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on **August 9, 2021**. Subsequently, in accordance with the pattern of the Scheduling Order, the Commissioner's Response would then be due **October 8, 2021**. Plaintiff's Reply would then be due **October 29, 2021**.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.
Bar Code H06529
Counsel for Plaintiff

~~CC [via ECF]: Emily Fishman (Counsel for Defendant)~~

Application GRANTED. No further extensions will be granted absent compelling circumstances.

SO ORDERED.

Dated: June 8, 2021

New York, NY

Honorable Barbara C. Moses

U.S. Magistrate Judge